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Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY


Re: E91 I Phase II Implementation. CC Docket No. 94-102

Dear Ms. Dortch:

On November 10, 2002, I spoke with Blaise Scinto, Deputy Chief, Policy Division, Wireless Telecommunications Bureau. I stated that there continued to be problems with LECs providing service on the PSAP side of the demarcation point to the ALI databases. I also stated that there are a number of reasons related both to the PSAP issues and LEC issues on the PSAP side of the demarcation point that can cause delay in the E91 I implementation process and cause a wireless carrier to be unable to complete deployment within six months of the date of the request. The FCC needs to take this full range of circumstances into account in interpreting its E91 I rules.

In accordance with the Commission's rules, a copy of this letter is being filed electronically in the above-captioned docket.

Sincerely,



John T. Nakahata
Counsel to J-Mobile USA, Inc.

JTN/krs